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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**Related Docket Nos. 711, 763, 765 &
778**

**NOTICE REGARDING DEBTORS’ OBJECTION
TO THE MOTION OF THE FOREIGN REPRESENTATIVES
OF THREE ARROWS CAPITAL, LTD. FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING THE ISSUANCE
OF SUBPOENAS FOR THE PRODUCTION OF DOCUMENTS BY THE DEBTORS**

PLEASE TAKE NOTICE that, on January 19, 2023, Genesis Global Holdco, LLC and its affiliates Genesis Global Capital, LLC and Genesis Asia Pacific Pte. Ltd., as debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors” and the cases, the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on September 15, 2023, the joint liquidators and foreign representatives (the “Joint Liquidators”) of Three Arrows Capital, Ltd.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

(“3AC”) filed the *Motion for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing the Issuance of Subpoenas for the Production of Documents by the Debtors* (the “2004 Motion”) (ECF No. 711).

PLEASE TAKE FURTHER NOTICE that, on September 21, 2023, the Joint Liquidators filed a notice stating that a hearing on the 2004 Motion would be held October 6, 2023 (the “2004 Hearing”).

PLEASE TAKE FURTHER NOTICE that, on September 29, 2023, the Debtors filed an objection to the 2004 Motion (the “Debtors’ Objection”) (ECF No. 763), to which the Official Committee of Unsecured Creditors (the “UCC” and, together with the Debtors and the Joint Liquidators, each a “Party” and collectively the “Parties”) filed a joinder (the “UCC Joinder”) (ECF No. 765).

PLEASE TAKE FURTHER NOTICE that, on October 4, 2023, the Joint Liquidators filed a reply (ECF No. 778, the “Reply” and, together with the 2004 Motion, the Debtors’ Objection, and the UCC Joinder, the “2004 Briefing”) in further support of the 2004 Motion and in opposition to the Debtors’ Objection and the UCC Joinder.

PLEASE TAKE FURTHER NOTICE that the 2004 Hearing was held before the Honorable Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (ECF No. 779), during which the Court directed the Parties to submit, by October 13, 2023, additional caselaw, if any, that each Party may determine would assist the Court’s analysis of the remaining issues in the 2004 Briefing.

PLEASE TAKE FURTHER NOTICE that the Debtors believe that the 2004 Motion is fully briefed and do not intend to submit any additional caselaw or authorities in further support of the Debtors’ Objection.

Dated: October 13, 2023
New York, New York

/s/ Luke A. Barefoot
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